UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

BRIDGESTONE AMERICAS, INC.,

Plaintiff,

VS.

INTERNATIONAL BUSINESS MACHINES CORPORATION,

Defendant.

Civil Docket No. 3:13-CV-1196

JURY DEMANDED

Judge Sharp Magistrate Judge Brown

JOINT STATUS REPORT

The parties have diligently engaged in further negotiations over search term lists and the selection and extent of e-discovery custodians referred to in the CMO. The parties have reached a final resolution, which they will file with the Court within 2-3 business days. At this time, they do not believe they require the Court's further intervention but will advise the Court immediately should that change. Also, if the Court would like any additional information prior to the parties' filing of the final resolution, the parties will do their best to provide it.

Respectfully submitted,

/s/ Charles Barrett (by JWC w/ perm.)

Charles F. Barrett CHARLES BARRETT, P.C. 6518 Highway 100, Suite 210

Nashville TN 37205

Telephone: (615) 515-3393 Facsimile: (615) 515-3395 /s/Jason W. Callen

Robert J. Walker Jason W. Callen WALKER, TIPPS & MALONE PLC 2300 One Nashville Place 150 Fourth Avenue North Nashville, TN 37219

Telephone: (615) 313-6000 Facsimile: (615) 313-6001

Aubrey B. Harwell, Jr. Aubrey B. Harwell, III Gerald D. Neenan NEAL & HARWELL, PLC One Nashville Place, Suite 2000 150 Fourth Avenue North Nashville, TN 37219 Telephone: (615) 244-1713 Facsimile: (615) 726-0573

Don Barrett BARRETT LAW GROUP, P.A. 404 Court Square Post Office Box 927 Lexington, MS 39095 Telephone: (662) 834-2488 Facsimile: (662) 834-2628

C. Michael Ellingburg
Mark Woods
DANIEL COKER HORTON & BELL
4400 Old Canton Road
Suite 400
Jackson MS 39211
Telephone: (601)969-7607

Facsimile: (601) 969-1116

Attorneys for Bridgestone Americas, Inc.

Andrew R. McGaan, P.C. Daniel R. Lombard Christine P. Payne KIRKLAND & ELLIS LLP 300 North LaSalle Street Chicago, Illinois 60654 Telephone: (312) 862-2000 Facsimile: (312) 862-2200

Attorneys for International Business Machines Corporation

CERTIFICATE OF SERVICE

I, Jason W. Callen, one of the attorneys for Defendant International Business Machines Corporation, certify that I caused the foregoing motion to be served electronically or by U.S. Mail on April 3, 2014 upon:

Attorneys for Plaintiff
Aubrey B. Harwell, Jr.
Aubrey B. Harwell, III.
Gerald D. Neenan
Neal & Harwell, PLC
One Nashville Place, Suite 2000
150 Fourth Avenue North

Nashville, TN 37219 Telephone: (615) 244-1713 Facsimile: (615) 726-0573

Attorney for Plaintiff
Charles F. Barrett,
Charles Barrett, P.C.
6518 Highway 100, Suite 210

Nashville, TN 37205

Telephone: (615) 515-3393 Facsimile: (615) 515-3395 Attorney for Plaintiff

Don Barrett

Barrett Law Group, P.A.

404 Court Square Post Office Box 927 Lexington, MS 39095

Telephone: (662) 834-2488 Facsimile: (662) 834-2628

Attorney for Plaintiff
C. Michael Ellingburg
Mark C. Woods

Daniel Coker Horton & Bell 4400 Old Canton Road

Suite 400

Jackson MS 39211

Telephone: (601)969-7607 Facsimile: (601) 969-1116

/s/Jason W. Callen

Jason W. Callen

103326